

Dennis F. Dunne
Luc A. Despins
Wilbur F. Foster, Jr.
MILBANK, TWEED, HADLEY & M^cCLOY LLP
1 Chase Manhattan Plaza
New York, NY 10005
Telephone: (212) 530-5000

-and-

Paul Aronzon
Gregory A. Bray
MILBANK, TWEED, HADLEY & M^cCLOY LLP
601 South Figueroa Street, 30th Floor
Los Angeles, CA 90017
Telephone: (213) 892-4000

Proposed Counsel for Official
Committee of Unsecured Creditors
of Lehman Brothers Holdings Inc., et al.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	X	

**JOINDER OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS IN DEBTORS' OBJECTION TO THE MOTION OF
WILLIAM KUNTZ III FOR AN ORDER LIFTING OR MODIFYING
THE AUTOMATIC STAY IN THESE CHAPTER 11 CASES**

The Official Committee of Unsecured Creditors (the "Committee") appointed in
the above-captioned chapter 11 cases (the "Chapter 11 Cases") of Lehman Brothers Holdings
Inc. and its affiliated debtors (other than Lehman Brothers Inc.) (collectively, the "Debtors")
hereby joins (the "Joinder") in the Debtors' objection (the "Objection") to the motion of William

Kuntz, III (“Kuntz”), filed September 18, 2008 (the “Motion”), for an order lifting or modifying the automatic stay in the Chapter 11 Cases, and respectfully states as follows:

BACKGROUND

1. On September 15, 2008 and periodically thereafter, the Debtors commenced the Chapter 11 Cases. The Debtors have been authorized to operate their businesses and manage their properties as debtors in possession pursuant to section 1107(a) and 1108 of the Bankruptcy Code. On September 17, 2008, the United States Trustee for the Southern District of New York (the “U.S. Trustee”) appointed the Committee. No trustee or examiner been appointed in the Chapter 11 Cases.

2. On September 18, 2008, Kuntz filed the Motion, seeking a modification of the automatic stay, apparently to pursue purported claims against Grand Union Capital – an entity unrelated to the Debtors or the Chapter 11 Cases that reorganized under the supervision of the United States Bankruptcy Court for the District of Delaware in 1995.

JOINDER AND OBJECTION

3. The Committee joins in the Debtors’ opposition to the Motion for all the reasons set forth in the Objection, including, without limitation, on the grounds that: (i) Kuntz has failed to demonstrate that he has any interest in any property of the Debtors or the Chapter 11 Cases; (ii) Kuntz has failed to demonstrate any cause for lifting the automatic stay in respect to the Motion; (iii) a balancing of the harms, including the impact on creditors of the estates, weighs in favor of denial of the Motion; and (iv) the Court should give no weight to Kuntz’s status as a *pro se* litigant due to his decades as a “professional” litigant.

WHEREFORE, the Committee respectfully requests that the Court (i) deny the Motion; and (ii) grant such other relief as is just.

Dated: New York, New York
October 13, 2008

MILBANK, TWEED, HADLEY & M^cCLOY LLP

By: /s/ Dennis F. Dunne
Dennis F. Dunne
Luc A. Despins
Wilbur F. Foster, Jr.
1 Chase Manhattan Plaza
New York, NY 10005
Telephone: (212) 530-5000

-and-

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